

AARON D. FORD
Attorney General
Douglas R. Rands (Bar No. 3572)
Senior Deputy Attorney General
State of Nevada
Office of the Attorney General
555 East Washington Avenue
Suite 3900
Las Vegas, Nevada 89101
(702) 486-3326 (phone)
(702) 486-3773 (fax)
Email: cguy@ag.nv.gov

*Attorneys for Defendants James Dzurenda, Charles Daniels,
Sheryl Foster, Jo Gentry, Tanya Hill, Gabriela Najera,
Dwight Neven, Cynthia Ruiz, Kim Thomas, and Patrick Vejar*

LISA A. RASMUSSEN, Esq.
Law Offices of Kristina Wildeveld & Associates
550 East Charleston Blvd.
Las Vegas, Nevada 89101
(702) 222-0007 (phone)
(702) 222-0001 (fax)
Email: Lisa@veldlaw.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ELIZABETH CARLEY,

Plaintiff,

v.

JO GENTRY, *et al.*,

Defendants.

Case No. 2:17-cv-02670-MMD-VCF

**STIPULATION TO CONTINUE
TRIAL DATE
(Second Request)**

Plaintiff Elizabeth Carley, by and through counsel, Lisa. A. Rasmussen, and Defendants, Sheryl Foster, Patrick Vejar, Jo Gentry, James Dzurenda, Charles Daniels, Gabriela Najera, Tanya Hill, Dwight Neven, Cynthia Ruiz, and Kim Thomas, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Douglas R. Rands, Senior Deputy Attorney General, of the State of Nevada, Office of the Attorney General, hereby submit this Stipulation to Continue the trial date in this matter to a trial stack in 2024 based upon the following:

1 1. This case is presently set for the December 4, 2023 trial stack.

2 2. Ms. Carley is not able to get time off of work to attend her trial in December
3 because December is her employer's busiest month and her employer has indicated that
4 she does not have permission to be gone the week of December 4, 2023, the week this case
5 is set for trial. Ms. Carley recently relocated to Austin, Texas. To the extent that we
6 (society) encourage gainful employment upon re-entry into society as part of lawful post-
7 incarceration reintegration, it would be prejudicial to her to force her to decide between
8 attending her trial or losing her job. Ms. Carley has indicated that after the first of the
9 year, she would be able to take time off, but she is not able to do so during the holiday
10 season.

11 2. The state has had several trials back to back and is not opposed to moving
12 this matter to a date after the first of the year.

13 3. The parties are still trying to resolve this matter and the additional time
14 would be helpful to reaching a resolution.

15 4. There has been only one other request to move the trial date due to Ms.
16 Rasmussen's trial schedule in another case and this request is not made for the purpose of
17 delay.

18 5. Accordingly, the parties jointly stipulate and request that this trial be moved
19 to a stack in 2024 on a date the court can accommodate. Plaintiffs counsel does have a
20 capital trial scheduled for January 22, 2024, so a date in late February or later is preferred.

21
22 DATED this 8th day of November 2023

23 By: /s/ Lisa A. Rasmussen

24 LISA A. RASMUSSEN, Esq.
25 Law Offices of Kristina Wildeveld &
26 Associates
27 550 E. Charleston Blvd.
28 Las Vegas, Nevada 89101
 Attorneys for Plaintiff

 DATED this 8th day of November 2023

 By: /s/ Douglas R. Rands

 DOUGLAS R. RANDS
 Senior Deputy Attorney General
 Office of the Nevada Attorney General
 555 E. Washington Avenue, #3900
 Las Vegas, Nevada 89101
 Attorneys for Defendants

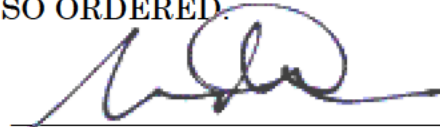
ORDER

Upon the Stipulation of the parties, and good cause appearing, IT IS HEREBY ORDERED that the trial in this matter is moved to the two- week trial stack in Las Vegas to commence on February 27, 2204. Calendar call is moved to the 5th day of February, 2024.

IT IS FURTHER ORDERED that Motions in Limine are to be filed on or before the 12th day of January, 2024.

IT IS FURTHER ORDERED that Jury instructions and final witness and exhibits lists are due one week before the trial. See amended order regarding trial for details .

IT IS SO ORDERED.


UNITED STATES JUDGE

DATE: November 9, 2023